EXHIBIT D

STIPULATED FACTS AND LAW

By listing the uncontested issues of fact and law below, the parties are not conceding that any given issue of fact or law is relevant to any of the claims or defenses in this action. The parties expressly reserve their right to object to the admissibility of any of the issues of fact or law listed below. The parties further expressly reserve their right to introduce additional facts related to those listed below.

1. This is a class action brought on behalf of all persons who purchased domestically or purchased on domestic exchanges Pfizer Inc. ("Pfizer" or the "Company") common stock between January 19, 2006 and January 23, 2009, inclusive.

2. Pfizer is a publicly-traded company whose common stock trades on the New York Stock Exchange under the symbol PFE.

3. The shares of Pfizer common stock are "securities."

4. Pfizer filed annual Forms 10-K with the United States Securities and Exchange Commission ("SEC") on March 1, 2006, March 1, 2007 and February 29, 2008.

5. Pfizer filed quarterly Forms 10-Q with the SEC on May 8, 2006, August 11, 2006, November 3, 2006, May 4, 2007, August 6, 2007, November 5, 2007, May 2, 2008, August 8, 2008 and November 7, 2008.

6. The marketing and sale of prescription medicines is regulated by the Food Drug and Cosmetic Act, as administered by the Food and Drug Administration (the "FDA"). The FDA approves medicines for sale in the United States.

7. From 2002 through April 2005, Pfizer manufactured and sold the prescription medicine Bextra. Bextra is the brand name for the drug valdecoxib. Bextra is a type of non-steroidal anti-inflammatory drug (NSAID), called a COX-2 selective inhibitor. In 2001, the FDA approved Bextra at the 10 mg dose once daily for the relief of signs and symptoms of

osteoarthritis (OA) and adult rheumatoid arthritis (RA). It was also approved by the FDA at the 20 mg dose twice daily as needed for treatment of primary dysmenorrhea (PD) (*i.e.*, menstrual cramps).

8. From 2001 through the present, Pfizer has manufactured and sold the prescription medicine Geodon. Geodon is the brand name for the drug ziprasidone. In 2001, the FDA approved Geodon for the treatment of schizophrenia. In 2002, the FDA also approved Geodon in the injectable form for the treatment of acute agitation in schizophrenic patients for doses up to 40 mg per day. In 2004, the FDA also approved Geodon for treatment of acute mania or mixed episodes associated with bipolar disorder for doses up to 80 mg twice a day.

9. From 2005 through the present, Pfizer has manufactured and sold the prescription medicine Lyrica. Lyrica is the brand name for the drug pregabalin. On December 30, 2004, the FDA approved Lyrica for treatment of diabetic peripheral neuropathy (DPN) and postherpetic neuralgia (PHN). The FDA also approved Lyrica in June 2005 as an adjunctive therapy for adults with partial onset seizures and in June 2007 for the treatment of fibromyalgia.

10. From 2000 through the present, Pfizer has manufactured and sold the prescription medicine Zyvox. Zyvox is the brand name for the drug linezolid. Zyvox is primarily used to combat pneumonia caused by methicillin-resistant *Staphylococcus aureus* ("MRSA") infections. In 2000, the FDA approved Zyvox for (i) community-acquired pneumonia caused by *Streptococcus pneumonia* (penicillin-susceptible strains only), including cases with concurrent bacteremia, or *Staphylococcus aureus* (methicillin-susceptible strains only); (ii) Nosocomial pneumonia caused by *Staphylococcus aureus* (methicillin-susceptible and resistant strains), or *Streptococcus pneumonia* (penicillin-susceptible stains only); (iii) complicated skin and skin structure infections (cSSSI) caused by *Staphylococcus aureus* (methicillin-susceptible and

resistant strains), *Streptococcus pyogenes*, or *Streptococcus agalactiae*; (iv) vancomycin-resistant *Enterococcus faecium* infections, including cases with concurrent bacteremia; and (v) uncomplicated skin and skin structure infections (uSSSI) caused by *Staphylococcus aureus* (methicillin-susceptible strains only) or *Streptococcus pyogenes*. In 2003, the FDA also approved Zyvox for treatment of diabetic foot infections.